

REMARKS/ARGUMENTS

Applicants submit this Amendment and Response to the Final Office Action dated December 13, 2005. Claims 1 and 27 have been amended as outlined herein. Accordingly, Claims 1-3 and 20-37 are now pending in the application.

Claims 1-3, 20, 21, and 27-32 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,571,805 to Hoenisch et al. ("Hoenisch") in view of U.S. Publication No. 2001/0002500 to Kasen et al. ("Kasen"). Furthermore, Claims 22-26 and 33-37 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Hoenisch and Kasen in view of either U.S. Patent No. 5,221,026 to Williams ("Williams") or U.S. Patent No. 6,705,332 to Field et al. ("Field"). In order to support a prima facie case of obviousness there must be some suggestion or motivation to modify the references or to combine the reference teachings, there must be a reasonable expectation of success, and the prior art reference or references must teach or suggest all of the claim limitations. *MPEP* §2143. However, all of the claim limitations set forth in the pending claims are not found in any of the above mentioned references. Accordingly, reconsideration and withdrawal of the rejections of the claims are respectfully requested.

Claim 1 is generally directed to a cleaning machine. As amended, Claim 1 recites in part, "a secondary pump in fluid communication with the fluid tank and in fluid communication with the third fluid delivery line adapted to introduce pressurized fluid into the inlet of the main pump, thereby displacing trapped gas through the outlet of the main pump and out the high-pressure fluid delivery line, wherein the secondary pump comprises a solenoid pump." Support for the claim amendments can be found in the specification, for example on page 34, lines 1-18. Neither Hoenisch, Kasen, Williams, nor Field teach a system wherein a secondary pump comprises a solenoid pump. Therefore, for at least these reasons, Claim 1 and dependent Claims 2, 3, and 20-26 are not obvious in view of any of the above cited references, and the rejections of Claim 1 and the dependent claims therefrom should be reconsidered and withdrawn.

Claim 27 is also generally directed to a cleaning machine. As amended, Claim 27 recites in part, "a secondary solenoid pumping means, which is in communication with the fluid storage tank and the main pumping means, which is adapted to deliver pressurized fluid into the main pumping

means thereby forcing air trapped therein to be expelled.” Neither Hoenisch, Kasen, Williams, nor Field teach a cleaning machine comprising a secondary solenoid pumping means. Therefore, for at least these reasons, Claim 27 and dependent Claims 28-37 are not obvious in view of any of the above mentioned references, and the rejections of Claim 27 and the dependent claims therefrom should be reconsidered and withdrawn.

The only cited reference that discloses a secondary pump is Kasen (see Fig. 4, item 280). The pump priming valve 280 in Kasen is operable to prime pump 112. In order to prime pump 112 the priming valve 280 is connected to a vacuum motor 74. The vacuum motor 74 exerts negative pressure on the fluid outlet of the pump 112 through the pump priming valve 280 in order to draw air out of a pumping chamber between the pump inlets and the solution tanks (Kasen, page 7, paragraph 74, lines 1-7). A drawback to using the pump priming valve 280 as disclosed in Kasen is that a vacuum motor 74 is required. Additionally, a plunger 290 is needed to ensure that no fluid is sucked up into the vacuum motor 74. If the plunger 290 were not present in the priming valve 280, then the vacuum motor 74 may intake fluid and become inoperable. Likewise, if the plunger 290 fails, the vacuum motor 74 may intake fluid and become inoperable. Furthermore, the priming valve 280 described in Kasen is not a very efficient way to prime a pump. Specifically, the vacuum motor 74 usually needs to be turned on for some non-trivial amount of time before the pump 112 is primed.

A solenoid pump, on the other hand, does not require use of a vacuum motor. In fact, the solenoid pump can be placed in the pumping system without requiring any additional elements to prime the primary pump. Thus, the priming of the primary pump is not dependent upon multiple elements. Furthermore, there is no risk of ruining a vacuum motor by accidentally having it intake fluid because a vacuum motor is not required or used. All of this leads to a cleaning machine that is lighter and less likely to require maintenance because of additional parts. A solenoid pump also does not require a plunger to protect a vacuum motor. Also, using a solenoid pump instead of a vacuum pump as described in Kasen may result in quicker priming times, this translating to higher cleaning efficiency because less time is spent waiting for the pump to be primed.

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Based upon the foregoing, Applicants believe that all pending claims are in condition for allowance and such disposition is respectfully requested. In the event that a telephone conversation would further prosecution and/or expedite allowance, the Examiner is invited to contact the undersigned.

Respectfully submitted,

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